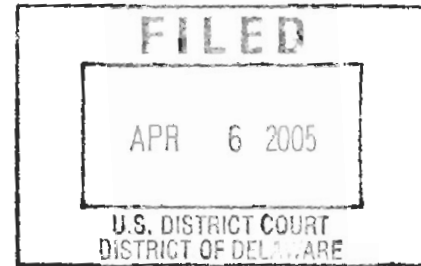


05-516MS
05-526MS
05-136MS



STATEMENT
OF
FACTS
IV

DATE : 3/29/05

Jimmie Lewis
JIMMIE LEWIS
SBI # 506627
H.R.Y.C.I
P.O BOX 9561
WILM, DE 19809

1.) THE (D.D.O.C.) DELAWARE DEPARTMENT OF -
CORRECTIONS COMMISSIONER, MR. STANLEY TAYLOR
HAS VIOLATED MY 1ST, 4TH, 5TH, 6TH, 7TH, 8TH & 14TH
UNITED STATES CONSTITUTIONAL RIGHTS.

SEE PARAGRAPH(S), #'S 1-55 & #56, & #57

2.) THE (H.R.Y.C.I.) HOWARD R. YOUNG CORRECTIONAL
INSTITUTION'S WARDEN, MR. RAPHEL WILLIAMS HAS
VIOLATED MY 1ST, 4TH, 5TH, 6TH, 7TH, 8TH & 14TH,
UNITED STATES CONSTITUTIONAL RIGHTS.

SEE PARAGRAPH(S) #'S 1-55 & #56 & #57

3.) (H.R.Y.C.I.) % CORRECTIONAL OFFICER,
CAPTAIN D. BAMFORD VIOLATED MY 1ST, 4TH, 5TH,
6TH, 7TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), # 11

4.) H.R.Y.C.I. % CAPT EMIG VIOLATED MY
1ST, 4TH, 5TH, 6TH, 7TH, 8TH & 14TH UNITED STATES
CONSTITUTIONAL RIGHTS, SEE PARAGRAPHS # 11

5.) H.R.Y.C.I. % CAPT P. PARKER AKA LT. P. PARKER
VIOLATED MY 1ST, 4TH, 5TH, 6TH, 7TH, 8TH & 14TH
UNITED STATES CONSTITUTIONAL RIGHTS.

SEE PARAGRAPH(S) # 11, # 20

- 6) H.R.V.C.I % CAPT JEFFERSON VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 52
- 7) (I. A) INTERNAL AFFAIRS OF THE (D.D.C.C) AND (H.R.V.C.I) VIOLATED MY 5TH, 8TH & 14TH, UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 55
- 8.) H.R.V.C.I % STAFF LT. J. SABATO VIOLATED MY 1ST, 4TH, 5TH, 6TH, 7TH, 8TH & 14TH - UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11, # 18
- 9) H.R.V.C.I % LT SHEETS VIOLATED MY 1ST, 4TH, 6TH, 5TH, 7TH, 8TH & 14TH - UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11, # 22
- 10) H.R.V.C.I % LT. S. FARMER VIOLATED MY 1ST, 4TH, 5TH, 6TH, 7TH, 8TH, & 14TH - UNITED STATES CONSTITUTIONAL RIGHTS
SEE PARAGRAPH(S), # 11, # 21, # 57
- 11). H.R.V.C.I % LT. MITCHELL VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 11, # 23

- 12.) H.R.Y.C.I C/O LT. CHUDZIG VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 13
- 13.) H.R.Y.C.I C/O SGT. M. MOODY VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), # 51
- 14.) H.R.Y.C.I C/O SGT. F. WAY VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11, # 27, # 14
- 15.) H.R.Y.C.I C/O SGT C. RICHARDS VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), # 11
- 16.) H.R.Y.C.I C/O SGT MEDFORD VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), # 11
- 17.) H.R.Y.C.I C/O SGT LEWIS VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), # 44

- 18.) H.R.Y.C.I % SGT KENNEDY VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS, SEE PARAGRAPH(S), # 44
- 19.) D.D.O.C % CORPORAL A. GOINS VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE ATTACHED PARAGRAPH(S), # 10
- 20.) D.D.O.C % CORPORAL A. DAVIS VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 10
- 21.) H.R.Y.C.I % CORPORAL HARRIFORD VIOLATED MY 5TH, 8TH & 14TH UNITED STATE CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 13, # 11, # 25
- 22.) H.R.Y.C.I % CORPORAL CHAPEL VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 13
- 23.) H.R.Y.C.I % CORPORAL CUMBERBACK VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 27, # 28

24.) H.R.Y.C.I C/O PRESLEY VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 12

25.) H.R.Y.C.I C/O C. JOHNSON VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 12, # 54

26.) H.R.Y.C.I C/O TALENTI VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 44, # 11, # 3

27.) H.R.Y.C.I C/O M. BLUE VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11

28.) H.R.Y.C.I C/O MS. NEWMAN VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11,

29.) H.R.Y.C.I C/O D. CARLOCK VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 11

30.) H.R.Y.C.I C/O B. APA VIOLATED MY 5TH, 8TH &
14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), # 54,

- 31.) H.R.Y.C.I % V. WILLIAMS VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 27, # 15
- 32.) H.R.Y.C.I % CANON VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS SEE PARAGRAPH(S), # 27
- 33.) H.R.Y.C.I % G. INCE VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 27
- 34.) H.R.Y.C.I % SOUL VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 13
- 35.) H.R.Y.C.I % A. ARMSTRONG VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 11
- 36.) H.R.Y.C.I % GASSNER VIOLATED MY 5TH, 8TH, & 14 UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 28
- 37.) H.R.Y.C.I % D. YOUNG VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 11

38.) H.R.Y.C.I. C/O MACK .R VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), #44, #27

39.) H.R.Y.C.I. C/O N. BORDLEY VIOLATED MY
5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS. SEE PARAGRAPH(S), #11

40.) FIRST CORRECTIONAL MEDICAL (F.C.M.)
VIOLATED MY 1ST, 4TH, 5TH, 6TH, 8TH & 14TH
UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), #1, #2, #3, #4, #5, #7, #8, #16,

41.) F.C.M.'S DOCTOR ALI VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S) ~~#1~~ #8

42.) F.C.M.'S DOCTOR JOSHI VIOLATED MY 5TH, 8TH,
& 14TH UNITED STATES CONSTITUTIONAL RIGHTS.
SEE PARAGRAPH(S), #2, #3, #4, #5.

43.) F.C.M.'S DOCTOR BOSTON VIOLATED MY
5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL
RIGHTS, SEE PARAGRAPH(S), #53

- 44.) F.C.M's P.A FISH VIOLATED my UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 5
- 45.) F.C.M's MENTAL HEALTH CARE PROVIDER MS. D. MUSKARELI VIOLATED my 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), ~~26~~ # 26
- 46.) F.C.M's NURSE INNA VIOLATED my 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 4
- 47.) F.C.M's NURSE DIANNE HERNANDEZ VIOLATED my 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 4
- 48.) F.C.M's NURSE K. JOHNSON VIOLATED my 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 11
- 49.) F.C.M's NURSE C. BELL VIOLATED my 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 11
- 50.) H.R.Y.C.I SECURITY SUPERINTENDANT VIOLATED my 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 50, # 17

- 51) H.R.Y.C.I % WAYMAN VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS, SEE PARAGRAPH(S), #6
- 52) H.R.Y.C.I % MASE VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S) #27
- 53) H.R.Y.C.I % CHAFFER VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), #27
- 54) F.C.M's NURSE JEROMY VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), #4
- 55) H.R.Y.C.I % RODRIGUEZ VIOLATED MY 5TH, 8TH, AND 14TH UNITED STATES CONSTITUTIONAL RIGHTS SEE PARAGRAPH(S) #39, #28,
- 56) H.R.Y.C.I % HARDGRAVE VIOLATED MY 5TH, 8TH & 14TH, UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), #28
- 57) H.R.Y.C.I % EMIG VIOLATED MY 5TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), #28

- 58) H.R.Y.C.I % DAVIS VIOLATED MY 5TH, 8TH & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 28
- 59) H.R.Y.C.I FOOD SERVICE ADMINISTRATOR MICHAEL KNIGHT VIOLATED MY 5TH, 8TH, 1ST, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 40, # 41
- 60.) H.R.Y.C.I % LT POLK VIOLATED MY 5TH, 1ST, 4TH, 6TH, 7TH, 8TH, & 14TH UNITED STATES CONSTITUTIONAL RIGHTS. SEE PARAGRAPH(S), # 24

(PARAGRAPH # 1)

THE DATE OF MY INCARCERATION 5/26/03, THE WILMINGTON DELAWARE POLICE PUT ME IN THE CUSTODY OF THE DELAWARE DEPARTMENT OF CORRECTIONS (D.D.O.C) AT THE HOWARD - R. YOUNG CORRECTIONAL INSTITUTION, (H.R.Y.C.I) AKA - THE MULTI PURPOSE CRIMINAL JUSTICE FACILITY, (M.P.C.J.F), LOCATED AT 1301 E. 12 TH STREET, WILMINGTON, DE 19809.

AT THAT TIME I WAS CLASSIFIED BY FIRST CORRECTIONAL MEDICAL (F.C.M), AS BEING DELUSIONAL AND PSYCHOTIC, FOR WHICH IS WHY I WAS ADMITTED INTO THE INFIRMARY'S PSYCH CLOSE OBSERVATION ROOM(S) # 196 AND OR # 197 ON PCO LEVEL II STATUS, IN WHICH IS LEASED AND FACILITATED BY (F.C.M). (F.C.M) DID NOT HAVE A MENTAL HEALTH CARE PROVIDER ON STAFF 24 HOURS A DAY TO ADMINISTER MENTAL HEALTH CARE, WHENEVER A MENTAL HEALTH PATIENT SUCH AS MYSELF NEEDS IT, AND (F.C.M) STILL DOESNT HAVE A 24 HOUR MENTAL HEALTH CARE PROVIDER. I WAS LEFT WITHOUT MENTAL HEALTH CARE DURING VITAL MOMENTS OF MY ADMISSION IN THE INFIRMARY, FOR EXAMPLE WHENEVER I WAS DELUSIONAL AND OR PSYCHOTIC DURING 12 TO 8 SHIFT, THERE WAS NOT A MENTAL HEALTH CARE PROVIDER ON DUTY, OR EITHER WHEN I SIMPLY REQUESTED DRINKING WATER, OR WHEN I REQUESTED TO WASH MY HANDS WITH SOAP AND WATER BEFORE MEALS WERE SERVED

(CONT.)

(P. 2)

OR TO SUPERVISE RECREATIONAL RELIEF, BECAUSE THERE IS NOT A MENTAL HEALTH CARE PROVIDER READILY AVAILABLE 24 HOURS OR SIMPLY POSTED IN THE INFIRMARY DURING REGULAR WORKING HOURS? , GIVES REASON WHY NANCY DUNLAP AN INVESTIGATOR FOR THE DISTRICT ATTORNEY WAS ALLOWED TO INTERVIEW ME WHILE I WAS WEARING A SUICIDE GOWN, - INCOMPETENT UNDER THE INFLUENCE OF MIND ALTERING PSYCHOTROPIC MEDICATIONS. DUE TO THE LACK OF PROPER MENTAL HEALTH CARE SUPERVISION GIVES REASON TO WHY I WAS CALLED TO STAND TRIAL WITHOUT (F.C.M) FIRST INFORMING THE SUPERIOR COURT OF MY CRONIC MENTAL HEALTH STATUS FOR WHICH I WAS PRESCRIBED PSYCHOTROPIC MEDICINE BY (F.C.M's) DOCTOR, DR JOSHI, AND FOR WHICH I AM NOW PRESENTLY PRESCRIBED 400 MG'S OF SEROQUEL DAILY.

(PARAGRAPH 2)

THE (D.D.O.C) (H.R.V.C.I), INFIRMARY'S PSYCH CLOSE OBSERVATION ROOM(S) # 196 & # 197 ARE THE ROOMS THAT (F.C.M) ADMITTED ME INTO THAT CAUSED ME TO BE REPEATEDLY SUBJECTED TO MANY DIFFERENT MENTAL AND PHYSICAL HEALTH HAZARDS. WHEN EVER I WAS DIAGNOSED AS BEING DELUSIONAL OR PSYCHOTIC I WOULD BE ADMITTED INTO EITHER ROOM # 196 OR # 197 IN WHICH DISPLAYED ME BEING SUBJECTED TO THE INHUMANE LIVING CONDITIONS, AND THEREFOR SUBJECTING ME TO BE WROCK, RIDICULED AND SLANDERED AS IF I WERE A ANIMAL IN A CAGE AT THE ZOO.

(CONT.)

(P.3)

THE (CAGES) - ROOMS HAVE WINDOWS THAT ARE ABOUT 3 FEET IN LENGTH AND 2 FEET IN WIDTH. THESE ROOMS ARE THE ONLY DESIGNATED ASSIGNED HOUSING QUARTERS FOR PSYCH PATIENTS ON PCO LEVEL II STATUS. THESE ROOMS ARE NOT DESIGNED TO BE INHABITED FOR MORE THAN (4) HOURS. I WAS MADE TO SUFFER BECAUSE THE PSYCHIATRIST DIDNT, NOR DID THE MENTAL HEALTH CARE STAFF ASSESS ME FOR DISCHARGE EVER (4) HOURS, AND ALSO BECAUSE THERE ARE NO SINKS WITH RUNNING WATER, AND BECAUSE THERE ARE NO TOILETS THAT GRANTED ME PROPER DISPOSAL OF MY BODILY FLUIDS AND OR BODILY WASTE, TAKE NOTICE THAT IT IS NOT POLICY FOR H.R.Y.C.I SECURITY STAFF TO ALLOW ME ~~TO~~ ADEQUATE ACCESS TO A SINK OR TOILET TO PROPERLY DISPOSE OF BODILY FLUIDS AND OR BODILY WASTE WHILE I WAS PRESCRIBED TO BE ON PSYCH PCO LEVEL II STATUS. THIS GIVES REASON WHY ROOMS # 196 AND # 197 HAVE BECOME SATURATED WITH FECES, URINE, MUCUS, BLOOD, SALIVA AND MANY OTHER COMMUNICABLE GERMS IN WHICH ARE DIRECTLY RESPONSIBLE FOR MY BLADDER BECOMING INFECTED MORE THAN (5) TIMES.

(PARAGRAPH 3)

APON MY BEING ~~ADMITTED~~ SUBJECTED TO ROOMS # 196 AND OR # 197 FOR DAYS, WEEKS AND FOR AS LONG AS A MONTH, DURING MY ADMISSION IN THE INFIRMARY,

(CONT.)

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8 TO 4 SHIFT C/O'S TALENTI AND MS. NEWMAN, AND 4 TO 12 SHIFT C/O'S M. BLUE HAVE ALL REPEATEDLY DENIED MY EVERY REQUEST TO BE ALLOWED TO SIMPLY WASH MY HANDS WITH SOAP AND WATER BEFORE MEALS ARE SERVED, THESE EXACT SAME (H.R.Y.C.I.) CORRECTIONAL OFFICERS HAVE ALSO REPEATEDLY DENIED ME DRINKING - WATER, IN WHICH CAUSED ME TO BECOME DEHYDRATED ON MANY OCCASIONS CAUSING MY BLADDER INFECTION TO BECOME AMPLIFIED. (H.R.Y.C.I.) C/O TALENTI HAS ALSO INTERFERRED WITH MY TREATMENT PRESCRIBED TO ME BY DR. JOSHI, BY WRITING DISCIPLINARY REPORTS THAT SUBJECTED ME TO THE (DHU) DISCIPLINARY HOUSING UNIT A PLACE THAT I CAN NOT RECEIVE ADEQUATE PSYCHOLOGICAL THERAPY. OFFICER TALENTI HAS ALSO REMOVED ITEMS I PURCHASED FROM COMMISSARY ON MANY DIFFERENT OCCASSIONS SUCH AS T-SHIRTS, SOCKS, UNDERWEAR AND SEVERAL BOOKS THAT TOTAL VALUE EQUALS \$ 200.

(PARAGRAPH 4)

DURING THE SUMMER, THE ROOMS BECOME EXTREMELY HOT, TO THE POINT THE CLIMATE IN THE POORLY VENTILATED ROOMS TRANSFORM THE ROOMS INTO A ~~SAUNA~~ SAUNA, IN WHICH HAS CAUSED ME TO SWEAT HEAVILY, LITERALLY CAUSING ME TO GASP FOR OXYGEN, IN WHICH ONLY MAGNIFIED MY NEED FOR WATER ~~QUANTITIES~~ (10) FOLD, ONLY TO HAVE MY REQUEST FOR WATER DENIED, IMAGINE THE AGONY, I HAVE!

(CONT.)

(P. 5)

I WOULD OFTEN WONDER IF THERE WAS A DIFFERENCE OF HOW I WAS THINKING AND FEELING, FROM HOW SOMEONE WHO WAS ON A JOURNEY ACROSS A DESERT LOST WITHOUT WATER? DURING THE WINTER MONTHS THE ROOMS ARE LITERALLY FREEZING TO THE POINT WHERE I HAVE BEEN ABLE TO SEE STEAM WHEN I EXHALED. ~~THE~~ EVERY ONE IN THE FACILITY WOULD HAVE ON HATS, SWEATERS, SCARFS, COATS AND GLOVES BUT BECAUSE ~~THE~~ FIRST CORRECTIONAL MEDICAL WAS OR IS SHORT OF STAFF, IT IS POLICY FOR PSYCH CLOSE WATCH LEVEL II PATIENTS TO BE STRIPPED OF ALL PERSONAL CLOTHING AND ITEMS, FOR WHICH ARE REPLACED BY ULTRA THIN PAPER GOWNS AND PAPER FOOTIES. BECAUSE THERE IS NO SUICIDE MATTRESS AT ALL, AND BECAUSE THE ROOMS, # 196 & # 197 ARE NOT PADDED OR RUBBERIZED, GIVES REASON FOR WHY I WAS FORCED TO ENDURE MY BARE SKIN COMING IN DIRECT CONTACT WITH THE ICE COLD FLOOR, THE ICE COLD CONCRETE PLATFORM OR THE ICE COLD PLASTIC (4) POINT RESTRAINT HARNESS WHEN EVER I HAD TO SIT OR REST. BECAUSE OF THIS I HAVE BECOME SICK WITH COLD AND FLU ON SEVERAL DIFFERENT OCCASSIONS. ON SEVERAL OCCASSIONS I HAVE TRIED TO OBTAIN MEDICAL TREATMENT FOR THESE ILLNESSES WHILE I WAS PRESCRIBED TO BE ON PCO-LEVEL II PSYCH CLOSE OBSERVATION STATUS, ONLY TO BE REPEATEDLY DENIED MEDICAL TREATMENT BY NURSE INNA, NURSE DIANNE HERNANDEZ, NURSE JEROMY AND NURSE P.A. FISH. —>

(CONT.)

(P. 6)

THE CITED (F.C.M) MEDICAL STAFF WOULD INSTRUCT ME TO FILL OUT A MEDICAL SICK CALL SLIP, KNOWING VERY WELL THAT (F.C.M AND OR H.R.Y.C.I) POLICY PROHIBITED ME FROM OBTAINING A PEN OR PENCIL AND PAPER. DOCTOR ARAMBURG WOULD PRESCRIBE ME MEDICINE ONCE I WAS DISCHARGED FROM THE INFIRMARY. THESE ROOMS WERE PRESCRIBED TO ENSURE MY SAFETY, BUT HAVE ONLY SERVED ME AS REPULSIVE, HIDEOUS, TORTURE CHAMBERS THAT ARE DIRECTLY RESPONSIBLE FOR THE PHYSICAL ILLNESSES I HAVE STATED, AS WELL AS FOR CAUSING ME TO CONTEMPLATE INDEPTH SUICIDAL WAYS AS A QUICK RATIONAL FORM OF RELIEF. I HAVE BEEN SUBJECTED TO THESE CONDITIONS ON MANY DIFFERENT OCCASSIONS, RANGING FROM ~~APPROXIMATELY 5/26/2003 TO MARCH 2005~~ 5/26/2003 TO MARCH 2005.

(PARAGRAPH 5)

WHILE PRESCRIBED TO BE ON PSYCH CLOSE OBSERVATION PCO LEVEL II STATUS, THE TIME HAD COME FOR ME TO FILE APPLICATION FOR CERTIFICATION TO THE SUPREME COURT, SO I INFORMED OFFICER TALENTI, WHO NOTIFIED CAPT EMIS, CAPT EMIS NOTIFIED MENTAL HEALTH PROVIDER D. NAPOLIN, D. NAPOLIN NOTIFIED P.A FISH, P.A FISH NOT ONLY DENIED ME LEGAL ASSISTANCE, BUT P.A FISH WROTE A MEMO THAT DENIED ME MY CONSTITUTIONAL RIGHT TO RECEIVE AND OR TO SEND LEGAL MAIL. →

(CONT)

(P. 7)

IT IS ALSO POLICY OF (F.C.M) AND (H.R.Y.C.I) THAT HAS REPEATEDLY DENIED ME AN ADMISSION PHONE CALL TO MY FAMILY AND OR TO MY ATTORNEY APON MY BEING ADMITTED INTO THE INFIRMARY, TO INFORM THEM OF MY PSYCHOLOGICAL CONDITION, NOR DID OR WOULD (F.C.M) OR (H.R.Y.C.I) CONTACT MY FAMILY AND OR MY ATTORNEY FOR ME.

THESE DENIALS HAVE CAUSED ME DILEMMAS CONCERNING MY SUPERIOR COURT CASE, IN WHICH ULTIMATELY DENIED ME MY CONSTITUTIONAL RIGHT TO A FULL AND FAIR TRIAL.

(PARAGRAPH 6)

OFFICER WAYMAN HAS ON NUMEROUS OCCASSIONS DENIED ME ADEQUATE TIME WITH THE DOCTOR, WHENEVER I WAS CALLED FOR A DOCTORS VISIT, BY COMING TO GET ME FIVE OR TEN MINUTES BEFORE INSTITUTIONAL COUNT TIME, RUSHING ME INTO THE DOCTORS OFFICE THEN ABRUPTLY ENDING MY DOCTORS VISIT BEFORE I WOULD BE ABLE TO RECEIVE PROPER CONSULTATION AND OR TREATMENT, IN WHICH I VIEW AS DELIBERATE INDIFFERENCE.

(PARAGRAPH 7)

(P. 85)

DR. ARAMBURO HAS INTERFERED WITH AND DELIBERATELY DENIED ME WHAT WAS PRESCRIBED TO ME BY MY CARDIOLOGIST, DR. PAUL C. PENNOCK, M.D., MEDICAL OFFICE BUILDING, SUITE 407, 7TH & CLAYTON ST, WILMINGTON, DELAWARE 19805 (302) 421-9721. DR. PENNOCK PRESCRIBED THAT I GET MY BLOOD PRESURE CHECKED (3) TIME A WEEK UNTIL MY BLOOD PRESURE WAS STABLE ENOUGH TO BE CONSIDERED SAFE. THIS IS A PRESCRIPTION THAT WAS PRESCRIBED TO ME AFTER PARTICIPATING IN A STRESS TEST, DUE TO ABNORMAL (EKG) TEST THAT CALLED FOR ME TO BE GIVEN NITROGLYCERIN ON (2) DIFFERENT OCCASSIONS. DR. ARAMBURO CHANGE AND OR DID NOT ADHERE TO DR. PENNOCKS PRESCRIPTION HAS PLACED ME IN HARMS WAY, IN WHICH DEFINES DELIBERATE INDIFFERANCE.

(PARAGRAPH 8)

ON FIVE (5) DIFFERENT OCCASSIONS DR. ARAMBURO HAS PRESCRIBED ME THE ANTI-BIOTIC BACTRIM FOR RE-OCCURING BLADDER INFECTION, SUBSEQUENTLY I WAS TRANSFERRED TO THE DELAWARE PSYCHIATRIC CENTER, AND DR. RAM ALSO TESTED AND DIAGNOSED ME, AND THEN PRESCRIBED ME THE ANTI-BIOTIC BACTRIM. THEREAFTER DR. S. FOSTER CONSULTED WITH DR. RAM AND I WAS SCHEDULED TO VISIT A UROLOGIST, BUT I WAS TRANSFERRED BACK TO (D.O.C.)-

(CONT.)

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AT THE (H.R.Y.C.I), BACK INTO THE CARE OF THE (F.C.M) DOCTORS. I BROUGHT THE FACT THAT DR. RAM AND DR. S. FOSTER SCHEDULED ME TO VISIT A UROLOGIST TO DR. ARAMBURO'S ATTENTION. DR. ARAMBURO CHECKED THE DOCTORS NOTES FROM THE DELAWARE PSYCHIATRIC CENTER AND THE WROTE A ~~REFERRAL~~ REFERRAL, BUT DR. ALI DENIED THE REFERRAL. DR. ALI'S DECISION DENING MY VISIT TO A UROLOGIST DEFINES DELIBERATE INDIFFERENCE.

(PARAGRAPH 9)

I WROTE TO (H.R.Y.C.I) WARDEN MR. RAPHEL WILLIAMS IN ORDER TO HAVE MY CIVILIAN ATTIRE TRANSFERRED TO THE NEW CASTLE COUNTY COURTHOUSE, IN ORDER FOR ME TO BE ABLE TO PRESENT MYSELF IN FRONT OF THE JURORS AS A RESPECTABLE LAW ABIDING CITIZEN, ETC, ETC. BUT ON OCT 6, 2003 (H.R.Y.C.I) WARDEN - MR. RAPHEL WILLIAMS INFORMED ME THAT MY CIVILIAN CLOTHING WOULD NOT BE TRANSFERRED TO THE NEW CASTLE COUNTY COURTHOUSE FOR SECURITY REASONS. SAID DENIAL DENIED ME MY CONSTITUTIONAL RIGHT FOR A FULL AND FAIR TRIAL.

(PARAGRAPH 10)

(P. 10)

DURING MY FIRST DAY OF TRIAL ON 10/21/03, D.D.O.C OFFICERS, CORPORAL A. DAVIS AND CORPORAL - A. GOINS WHO PROVIDED TRIAL COURT SECURITY FOR THE HONORABLE JUDGE PEGGY L. ABLEMAN ASSAULTED AND THREATENED ME ON THE COURT HOUSE ELEVATOR AS WELL AS ON THE COURT HOUSE GROUND FLOOR. THESE INCIDENTS PUT ME IN A STATE OF DURESS AS I PRESENTED TRIAL TESTIMONY, DUE TO THE FACT THAT BOTH OFFICER HAD THREATENED TO SPRAY ME WITH CAPSTUN AND BEAT ME IF I SPOKE IN THE COURT ROOM, THIS ALONG WITH MY BEING SEATED RIGHT NEXT TO CORPORAL A. DAVIS AS I PRESENTED TRIAL TESTIMONY, DENIED MY CONSTITUTIONAL RIGHT TO A FULL AND FAIR TRIAL. A COPY OF MY COMPLAINT IS ALSO DOCUMENTED AND FILED IN MY SUPERIOR COURT CRIMINAL CASE FILE NO. 0305016966 I HAVE SUBMITTED GRIEVANCES ON THIS MATTER, AS WELL AS FOR INCIDENTS THAT OCCURED ON FEB, 11, 2005 THE DATE I RETURNED TO THE NEW CASTLE COUNTY COURT HOUSE TO BE SENTENCED, AT WHICH OFFICERS A. GOINS THREATENED ME AND OFFICER A. DAVIS RIDICULED ME IN DIRECT REGARDS TO 10/21/03.

(PARAGRAPH 11)

(P. 11)

DURING THE COURSE OF MY INCARCERATION AT (H.P.Y.C.I.) MY CRONIC MENTAL ILLNESSES HAS CAUSED ME TO BE SUBJECTED TO NUMEROUS DISCIPLINARY ACTIONS THAT HAVE UNDOUBTEDLY INTERRUPTED TREATMENT TO ME BY DR. JOSHI A (F.C.M) PSYCHIATRIST OR THE MENTAL HEALTH STAFF. CAPT EMIG, CAPT BANTFORD, LT. P. PARKER AKA CAPT P. PARKER HAVE ALL PLACED ME ON ADMINISTRATIVE SEGREGATION OR ON THE DISCIPLINARY HOUSING UNIT - WITHOUT FIRST OBTAINING A PSYCHOLOGICAL ASSESSMENT OR EVALUATION EVEN THOUGH THEY WERE AND ARE FULLY OF MY MENTAL HEALTH PATIENT STATUS.

LT. J. SABATO, LT. SHEETS, LT. S. FARMER, LT. SIGNH, LT. MITCHELL, SGT KENNEDY, SGT, MEDFORD, SGT. F. WAY, SGT C. RICHARDS, HAVE ALL CONDUCTED DISCIPLINARY PROCEEDURES WHILE I WAS PRESCRIBED TO BE ON PSYCH CLOSE OBSERVATION PCO LEVEL II STATUS, WITHOUT FIRST OBTAINING A PSYCHOLOGICAL ASSESSMENT OR EVALUATION, EVEN THOUGH THEY WERE AND ARE FULLY AWARE OF MY MENTAL HEALTH ~~STATUS~~ PATIENT STATUS.

C/O M. BLUE, C/O D. CARLOCK, C/O D. YOUNG, C/O N. BORDLEY, C/O A. ARMSTRONG, NURSE C. BELL, NURSE K. JOHNSON ALL CONDUCTED DISCIPLINARY PROCEDURES ON ME WHILE I WAS PRESCRIBED TO BE ON PSYCH CLOSE OBSERVATION PCO-LEVEL II STATUS, WITHOUT FIRST OBTAINING A PSYCHOLOGICAL ASSESSMENT OR EVALUATION, EVEN THOUGH THEY WERE FULLY AWARE OF MY MENTAL HEALTH STATUS.

(PARAGRAPH 12)

(P. 12)

ON OR ABOUT AUG 15, 2003 I WAS IN CELL # 1 ON 1-E POD, THE DISCIPLINARY HOUSING UNIT (DHU). I CONFRONTED OFFICER PRESLEY ABOUT COACHING HIS CO-WORK OFFICER C. JOHNSON HOW TO BEST FALSIFY EXCESSIVE FORCE REPORTS BY SIMPLY STATING THE INMATE LUNGED AT YOU IN A THREATENING MANNER, AND THAT CAPSTUN WAS YOUR MOST APPROPRIATE MEANS OF DEFENSE. NOTE: OFFICER PRESLEY STATED THAT HE HAS DONE THIS ON NUMEROUS OCCASSIONS ALREADY AND THAT HE HAS NEVER BEEN REPERMANDED FOR IT YET. IT WAS THEREAFTER THAT OFFICER PRESLEY ORDERED ME TO THE REAR OF THE CELL AS HE OPENED THE DOOR. OFFICER C. JOHNSON STOOD AT THE DOORWAY AS OFFICER PRESLEY APPROACHED ME AND BEGAN SPRAYING ME WITH CAPSTUN APOON MY FACE, HANDS AND HEAD UNTIL I WAS SOAKED. LT. S. FARMER ALSO STOOD BY AND WATCHED, AFTER ABOUT 40 MINUTES I BEGAN TO KICK AND BANG ON THE DOOR FOR MEDICAL ASSISTANCE, I WAS THEN ESCORTED TO THE INFIRMARY, BUT THE NURSE WAS NOT ALLOWED TO PROVIDER MEDICAL ASSISTANCE FOR MY BURNING EYES, SKIN AND LUNGS, IN WHICH CONTINUED FOR SEVERAL DAYS, PER LT. S. FARMER.

NOTE: THERE WAS NOT ANY DISCIPLINARY REPORT WROTE AGAINST ME, IN WHICH VARIFIES THAT UNJUSTIFIABLE FORCE WAS UTILIZED AGAINST ME.

(PARAGRAPH 13)

(P.13)

ON OR ABOUT OCT 2, 2003, 12 TO 8 SHIFT OFFICERS LT. CHUDZIK, C/O HARRIFORD LEAD WORKER AKA CORPORAL HARRIFORD AND C/O SOUL ALL CAME INTO MY ASSIGNED CELL I- F POD ADMINISTRATIVE - SEGREGATION DUE TO MY REQUESTS TO BE ALLOWED TO SHOWER BEFORE BEING TRANSFERRED TO COURT. I INFORMED THE OFFICERS THAT I HAD NOT BEEN ABLE TO UTILIZE WATER FOR MORE THAN 72 HOURS BECAUSE MY SINK AND TOILET WATER HAD BEEN SHUT OFF DUE TO FLOODING. IN IMMEDIATE RESPONSE TO MY REQUEST LT. CHUDZIK ORDERED ONE OF HIS OFFICERS TO GET THE STRECHER FROM THE INFIRMARY. I WAS THEN HAND CUFFED AND MY FEET WERE SHACKLED, THEN I WAS STRAPPED DOWN TO THE STRECHER AND BARGED INTO THE DOORS AND WALLS FOR MORE THAN 40 YARDS UNTIL WE ARRIVED AT A AREA CALLED BOOKING AND - RECEIVING, I WAS THEN UNSTRAPPED FROM THE STRECHER AND TOSSED ON TO THE FLOOR HEAD AND SHOULDERS FIRST WHILE I WAS STILL HAND CUFFED AND SHACKLED. AT THIS POINT CORPORAL CHAPEL JOINED IN AND STEPPED ON MY HAND, WHILE C/O - HARRIFORD STEPPED ON MY NECK, AND C/O SOUL BENT MY LEGS WITHOUT TRYING TO REMOVE THE HAND CUFFS OF SHACKLES. NOTE: AS THE HAND CUFFS AND SHACKLES WERE BEING REMOVED, LT. CHUDZIK AND CORPORAL CHAPEL CONTINUOUSLY SHOUTED OFFENSIVE OBSCENE REMARKS I DIDNT RECEIVE A DISCIPLINARY REPORT FOR THE INCIDENT.

(PARAGRAPH 14) (P. 14)

WHILE HOUSED ON I-F POD CELL 13, FOR REASONS THAT WERE UNPROVOKED BY ME, I WAS ATTACKED AND ASSULTED BY AN INMATE NAME EARL WHO UTILIZED A BROOM STICK TO SHATTER THE WINDOW TO MY ASSIGNED CELL DOOR WHILE I WAS STANDING AT THE DOOR. SHARP FINE GLASS FROM THE CELL DOOR'S WINDOW, STUCK INSIDE OF MY FACE, NECK ARMS AND BODY. I WAS TAKEN TO MEDICAL, AND THE DOCTOR SIMPLY PRESCRIBED THAT THE BEST WAY TO REMOVE THE FINE GLASS PARTICLES WOULD BE FOR ME TO SHOWER. BUT SGT FRED WAY MOVED ME FROM CELL # 13 TO CELL # 18, AND INSTRUCTED C/O SHADE NOT TO ALLOW ME TO SHOWER? EVEN THOUGH I WAS SCHEDULED TO SHOWER THAT DAY. I HAD TO WAIT 48 HOURS BEFORE I COULD SHOWER THE GLASS OFF OF MY BODY.

(PARAGRAPH 15)

WHILE HOUSED ON I-E I WAS ATTACKED AND ASSULTED BY INMATES MYRON WILLIAMS AND TOSHAWN EDWARDS, FOR WHICH WAS A DIRECT RESULT OF THE POD OFFICERS NEGLIGENCE. TOSHAWN EDWARDS SBI# 439812 WAS ALREADY CLASSIFIED TO MAXIMUM SECURITY, NOTE THAT INMATE EDWARDS WAS A SENTENCED PRISONER AND I WAS NOT SENTENCED. NOTE: THESE ATTACKS ARE BELIEVED TO BE DIRECTLY RELATED TO THREATS I RECEIVED BY SECURITY STAFF HERE AT (H.R.Y.C.I).

(PARAGRAPH 16)

(P. 14)

BEING A MENTAL HEALTH PATIENT INCARCERATED AT (H.R.Y.C.I.) HAS BEEN SO DETRIMENTAL TO MY MENTAL HEALTH TREATMENT, DUE TO THE NUMEROUS CONSTITUTIONAL VIOLATIONS THAT HAVE BEEN COMMITTED AGAINST ME, SHOULD UNDOUBTEDLY CLASSIFY ANY MEDICAL REPORTS UTILIZED BY THE DELAWARE PSYCHIATRIC CENTER THAT WERE THE RESULT OF (F.C.M) AND OR (H.R.Y.C.I) PSYCHOLOGICAL ASSESSMENT TO PRODUCE A FORENSIC PSYCHIATRIC EVALUATION, SHOULD NOT BE RELIED ON BY THE TRIAL / SENTENCING JUDGE PEGGY L. ABLEMAN.

(PARAGRAPH 17)

THROUGH OUT THE COURSE OF MY INCARCERATION AT (H.R.Y.C.I) I HAVE BEEN EXPOSED TO CAPSTUN, IN - WHICH HAS ON EVERY OCCASSION CAUSED MY EYES TO BURN, MY THROAT TO BURN, MY LUNGS TO BURN AND MY SKIN TO BURN. THIS HAS HAPPENED TO ME AT LEAST TWELVE DIFFERENT OCCASSIONS, FOR WHICH THE EFFECTS HAVE STAYED WITH ME ON EACH OCCASSION FOR MORE THAN 24 HOURS. I DO NOT WANT TO BE CONTINUOUSLY EXPOSED TO THE UNKNOWN RESIDUAL DANGERS OF CAPSTUN.

(PARAGRAPH 18) (P. 15)

4 TO 12 SHIFT COMMANDER LT. JOSEPH SABATO HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES, LT J. SABATO HAS

- 1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME .
- 2.) HE HAS DENIED ME MY RIGHT TO HAVE A COUNSELOR .
- 3.) HE HAS DENIED ME MY RIGHT TO BE PRESENT AT THE DISCIPLINARY HEARING .
- 4.) HE HAS DENIED ME MY RIGHT TO CALL WITNESSES ,
- 5.) HE HAS DENIED ME MY RIGHT TO CONFRONT MY ACCUSER .
- 6.) HE HAS DENIED ME MY RIGHT TO APPEAL

(PARAGRAPH 19)

D.D.C.C COMMISSIONER STANLEY TAYLOR , AND H.R.V.C.I WARDEN RAPHEL WILLIAMS HAVE DENIED ME MY CONSTITUTIONAL RIGHTS TO THE FOLLOWING EACH TIME I WAS HOUSED ON ADMINISTRATIVE SEGREGATION -

1-F POD , OR THE DISCIPLINARY HOUSING UNIT 1-E POD .

- 1.) RELIGIOUS SERVICES ,
- 2.) RELIGIOUS COUNSELING ,
- 3.) VISITS ,
- 4.) TELEPHONE CALLS TO ATTORNEY OR - FAMILY ,
- 5.) MY RIGHT TO RECEIVE LITERATURE ,
- 6.) OUT DOOR RECREATION ,
- 7.) HAIR CUTS ,
- 8.) LAW LIBRARY ACCESS ,
- 9.) CLEAN UNIFORMS ,
- 10.) WARM CLOTHING ,
- 11) PROPER GRIEVANCE PROCEDURE ,
- 12.) HYGENE PRODUCTS ,
- 13) CLEANING SUPPLIES
- 14) MEALS SERVED TO ME IN A SANITARY MANNER .

(PARAGRAPH 20)

(P. 16)

LT. P. PARKER AKA CAPT P. PARKER HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES.

LT. P. PARKER 1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME. 2.) HE DENIED ME MY RIGHT TO HAVE A COUNSELOR. 3.) HE HAS DENIED ME MY RIGHT TO BE PRESENT AT THE DISCIPLINARY HEARING. 4.) HE HAS DENIED ME MY RIGHT TO CALL WITNESSES. 5.) HE HAS DENIED ME MY RIGHT TO CONFRONT MY ACCUSER. 6.) HE HAS DENIED ME MY RIGHT TO APPEAL.

(PARAGRAPH (21))

LT S. FARMER HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES. 1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME. 2.) DENIED ME MY RIGHT TO HAVE A COUNSELOR. 3.) DENIED ME MY RIGHT TO CALL WITNESSES. 4.) DENIED ME MY RIGHT TO CONFRONT MY ACCUSER. 5.) DENIED ME MY RIGHT TO APPEAL.

(PARAGRAPH 22)

(P.17)

LT. SHEETS HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES . 1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME . 2.) DENIED ME MY RIGHT TO HAVE A COUNSELOR . 3). DENIED ME MY RIGHT TO CALL WITNESSES . 4.) DENIED ME MY RIGHT TO CONFRONT MY ACCUSER . 5) DENIED ME MY RIGHT TO APPEAL .

(PARAGRAPH 23)

LT. MITCHELL HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES . 1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME . 2.) DENIED ME MY RIGHTS TO HAVE A COUNSELOR . 3) DENIED ME MY RIGHTS TO CALL WITNESSES . 4.) DENIED ME MY RIGHTS TO CONFRONT MY ACCUSER , 5) DENIED ME MY RIGHT TO APPEAL .

(PARAGRAPH 24)

(P. 18)

LT. POLK HAS DENIED ME MANY OF MY CONSTITUTIONAL RIGHTS DURING DISCIPLINARY PROCEDURES .

1.) DENIED ME MY RIGHT TO HAVE MY RIGHTS READ TO ME. 2.) DENIED ME MY RIGHT TO HAVE A COUNSELOR . 3.) DENIED ME MY RIGHT TO CALL WITNESSES . 4.) DENIED ME MY RIGHT TO CONFRONT MY ACCUSER . 5.) DENIED ME MY RIGHT TO APPEAL.

(PARAGRAPH 25)

C/O HARRIFORD UTILIZED THE TWO WAY INTERCOM SYSTEM TO SPY ON ME DURING MY PRE- TRIAL CONFINEMENT , IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 26)

MENTAL HEALTH CARE PROVIDER
MS. S. MUSKARELI UTILIZED THE TWO WAY INTERCOM SYSTEM TO SPY ON ME DURING MY PRE- TRIAL CONFINEMENT , IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 27)

(P.19)

C/O CANON, C/O V. WILLIAMS, C/O G. INCE,
 C/O CHAFFER, SGT F. WAY, C/O CUMBERBACK,
 C/O MACK. R., C/O MASE, HAVE ALL GIVEN ME
 24 HOUR SANCTIONS WITHOUT FIRST CONDUCTING
 A DISCIPLINARY HEARING, IN WHICH IS A VIOLATION
 OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 28)

C/O GASSNER, C/O HARDGRAVE, C/O RODRIGUEZ,
 C/O CUMBERBACK, C/O EMIG, C/O DAVIS,
 HAVE ALL SERVED
 ME EGGS IN A UNSANITARY MANNER THAT HAS
 GOTTEN ME SICK, FOR WHICH MEDICATION FOR
 MY ILLNESSES WERE PRESCRIBED.

(PARAGRAPH 29)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS
 ALLOWED THE INMATE TIERMEN TO SERVE ME EGGS
 IN A UNSANITARY MANNER, IN VIOLATION OF
 MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 30)

(P.20)

H.R.Y.C.I WARDEN MR RAPHEL WILLIAMS HAS ALLOWED ~~WAM~~ MEALS TO BE SERVED TO ME ON FILTHY TRAYS, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 31)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS ~~ALLOWED~~ NOT ALLOWED ME TO RECEIVE FRESH AIR AND SUNSHINE ON A WEEKLY BASIS, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 32)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS UTILIZED A TWO WAY INTERCOM SYSTEM TO SPY ON ME WHILE I WAS PRE-TRIAL, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 33)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS NOT SUPPLIED ADEQUATE CLEANING SUPPLIES TO SANITIZE MY ROOM, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 34)

(P. 21)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS FAILED TO CLASSIFY INMATES IN A MANNER THAT WILL NOT PRESENT AN IMMEDIATE DANGER TO MY SAFETY, A VIOLATION OF MY CONSTITUTIONAL RIGHTS

(PARAGRAPH 35)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS FAILED TO INSTALL GATES ON THE (DHU) 1-E POD, THAT WOULD PROTECT ME FROM ENCOUNTERING PHYSICAL ~~INMATE~~ ATTACKS FROM INMATES ~~UNLAWFUL~~ WITH DIFFERENT CLASSIFICATION STATUS.

(PARAGRAPH 36)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS FAILED TO INSTALL GATES ON THE ADMINISTRATIVE SEGREGATION UNIT 1-F POD, THAT WOULD PROTECT ME FROM ENCOUNTERING PHYSICAL ATTACKS FROM INMATES WITH DIFFERENT CLASSIFICATION STATUS.

(PARAGRAPH 37)

(P. 22)

H.R.V.C.I WARDEN MR. RAPHEL WILLIAMS UTILIZES AN INTERCOM SYSTEM THAT IS SO LOUD IT LEAVES MY ~~EAR~~ EARS RINGING, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 38)

H.R.V.C.I WARDEN MR. RAPHEL WILLIAMS HAS FAILED TO UTILIZE VIDEO CAMERAS WHEN EVER CORRECTIONAL OFFICERS ENTER OR EXTRACT ME TO OR FROM MY ASSIGNED CELL, IN WHICH HAS SUBJECTED ME TO NUMEROUS ~~RUNAWAY~~ PHYSICAL ATTACKS BY CORRECTIONAL OFFICERS WHILE I WAS HOUSED ON 1-E & 1-F PODS, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 39.)

H.R.V.C.I WARDEN MR. RAPHEL WILLIAM ~~ANDERSON~~ SENT C/O RODREGIEZ TO THE DELAWARE PSYCHIATRIC CENTER TO RETURN ME BACK INTO THE CUSTODY OF THE DELAWARE DEPARTMENT OF CORRECTIONS WITHOUT FIRST OBTAINING A COURT ORDER, A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 40)

(P.23)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS ALLOWED MICHEAL KNIGHT, THE FOOD SERVICE ADMINISTRATOR, ~~TO~~ SERVE ME THE FOLLOWING PORK PRODUCTS WITHOUT PROVIDING A SUBSTITUTE
 1.) PORK SAUSAGES, 2.) PORK TURKEY HAM, 3.) PORK SCRABBLE, IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 41)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS ALLOWED MICHEAL KNIGHT, THE FOOD SERVICE ADMINISTRATOR TO SERVE ME JUICE THAT CONTAINS SACRIN, A PRODUCT THAT CONTAINS CANCER CAUSING INGREDIENTS, AND ALSO THE JUICE DOES NOT CONTAIN THE FDA DAILY RECOMMENDED NUTRITION.

(PARAGRAPH 42)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS ALLOWED MY FOOD TO BE SERVED TO MY BY PEOPLE, BE IT INMATE / OFFICER ~~WHO ARE~~ WHO ARE NOT MEDICALLY CLEAR, AND THEREFOR COULD SPREAD COMMUNICABLE DISEASES, IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 43) (P. 24)

H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS PROVIDED ME AN INADEQUATE INMATE HANDBOOK THAT 1.) DOES NOT CONTAIN THE RULES OF ADMINISTRATIVE SEGREGATION 1-T POD, 2.) THE RULES OF THE DISCIPLINARY HOUSING UNIT 1-E POD, 3). - WHAT WOULD CLASSIFY ME TO ADMINISTRATIVE SEGREGATION, 4) WHAT IT TAKE TO RELEASE FROM ADMINISTRATIVE SEGREGATION, 5) THE HANDBOOK DOES NOT PROVIDE ME WITH INSTRUCTIONS THAT WOULD HELP FILE A GRIEVANCE THAT WONT BE RETURNED TO ME AS - NON-GRIEVABLE OR REQUEST ARE NOT PROCESSED THROUGH THE GRIEVANCE PROCEDURE.

(PARAGRAPH 44)

% LIVINGSTON CALLED MENTAL HEALTH TO MY ASSIGNED HOUSING POD, MENTAL HEALTH CLASSIFIED ME FOR PSYCH CLOSE OBSERVATION PCO LEVEL II STATUS. WHEN THE (Q.R.T) "QUIRK RESPONSE TEAM" ARRIVED, WHO WERE BEING SUPERVISED BY SGT KENNEDY & SGT LEWIS, THE TEAM IN WHICH INCLUDED % TALENTI & % MACK.R. WERE INSTRUCTED TO UTILIZE UNJUSTIFIABLE FORCE. THE OFFICERS TACKLED, KICKED AND PUNCHED ME JUST TO ESCORT ME TO THE INFIRMARY, IN WHICH VIOLATED MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 45)

(P.25)

ON SEVERAL OCCASSIONS MY INCOMING MAIL HAS NEVER REACHED ME , AND ON SEVERAL OCCASSIONS MY OUTGOING MAIL HAS NEVER REACHED ITS DESTINATION. ~~THE~~ H.R.Y.C.I WARDEN MR. RAPHEL WILLIAMS HAS FAILED TO PROVIDE A MAILING SYSTEM THAT SECURLY ~~PROV~~ SHIPS AND RECEIVES MY MAIL , SPECIFICALLY THIS MATTER IS WHAT I THINK IS DIRECTLY IN REGARDS TO THE MANY GRIEVANCES I HAVE FILE AND THE SUBSEQUENT COMPLAINTS I HEREBY CLAIM AGAINST H.R.Y.C.I ADMINISTRATORS AND SECURITY STAFF , WHOM HAVE THE OPPORTUNITY TO SIMPLY TRASH MY INCOMINGS OR OUTGOING MAIL , IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

PARAGRAPH 46.

DURING THE WINTER MONTHS THE CLIMATE ON THE PODS IN THE ROOMS ARE USUALLY 40 DEGREE'S AND BELOW . THE DILEMMA IS THAT I HAVE ~~MADE~~ ONLY BEEN PROVIDED WITH SHORT SLEEVE D.O.C SHIRTS THAT ARE THIN AS A DOCTORS SCRUBS. BEING SUBJECTED TO FRIGID COLD CLIMATES WITHOUT BEING PROVIDED WITH THERMAL UNDERWEAR , A HAT , A COAT , SHIRTS WITH SLEEVES IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 47)

(P. 26)

DURING THE SUMMER MONTHS THE CLIMATE ON THE PODS ARE SO HOT AND HUMID THAT THE ROOMS BECOME A SAUNA, THE WALLS SWEAT AND EVERYTHING BECOMES DAMP, AND IT IS VERY DIFFICULT TO SIMPLY BREATHE. THE TEMP IS USUALLY AROUND 82 TO 95 DEGREE'S. THE DILEMMA IS THAT I AM CONSTANTLY EXPOSED TO THIS CLIMATE FOR WEEKS AND MANY AS SIX, WITHOUT ANY FORM OF RELIEF. IN WHICH IS A VIOLATION OF MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 48)

THE "DELAWARE DEPARTMENT OF CORRECTIONS" (D.D.O.C)

- 1.) COMMISSIONER STANLEY TAYLOR FAILED TO PROPERLY TRAIN AND SUPERVISE THE H.R.Y.C.I WARDEN RAPHEL WILLIAMS;
- 2.) STANLEY TAYLOR FAILED TO PROPERLY ~~MANAGE~~ CORRECT THE CONSTITUTIONAL VIOLATIONS AT THE H.R.Y.C.I;
- 3.) STANLEY TAYLOR FAILED TO PROPERLY SUPERVISE, TRAIN AND OR CORRECT THE (D.D.O.C) OFFICERS CITED WITHIN THE CLAIM;
- 4.) STANLEY TAYLOR ALSO FAILED TO PROPERLY TRAIN, SUPERVISE AND OR CORRECT THE FIRST CORRECTIONAL MEDICAL ~~STAFF~~ AND STAFF WHO FACILITATE MEDICAL AND PSYCHOLOGICAL TREATMENT FOR (D.D.O.C) INMATES, IN WHICH VIOLATED MY CONSTITUTIONAL RIGHTS IN ALL ASPECTS WITHIN THE (D.D.O.C) (H.R.Y.C.I).

(PARAGRAPH 49)

(P.27)

1.) THE H.R.Y.C.I WARDEN RAPHEL WILLIAMS FAILED TO CONTROL AND OR CORRECT THE CONSTITUTIONAL VIOLATIONS AT THE H.R.Y.C.I, 2.) RAPHEL WILLIAMS FAILED TO PROPERLY TRAIN, CONTROL AND SUPERVISE THE H.R.Y.C.I OFFICERS CITED WITHIN THIS CLAIM, 3.) RAPHEL WILLIAMS FAILED TO PROPERLY TRAIN, SUPERVISE AND OR CORRECT THE FIRST CORRECTIONAL MEDICAL AND STAFF WHO FACILITATE MEDICAL AND PSYCHOLOGICAL TREATMENT FOR (D.D.O.C.) INMATES HOUSED AT (H.R.Y.C.I), IN WHICH VIOLATED MY CONSTITUTIONAL RIGHTS IN ALL ASPECTS.

(PARAGRAPH 50)

THE H.R.Y.C.I SECURITY SUPERINTENDANT MAJOR DAVE WILLIAMS FAILED TO PROPERLY TRAIN, CONTROL AND SUPERVISE THE H.R.Y.C.I OFFICERS CITED WITHIN THIS CLAIM, IN WHICH VIOLATED MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 51)

THE H.R.Y.C.I (I.G.C.) INMATE GRIEVANCE CHAIRPERSON SGT M. MOODY IGNORED, DENIED OR FAILED TO REVIEW GRIEVANCES I FILED ~~IN~~ IN ACCORDANCE TO INMATE GRIEVANCE PROCEDURE 4.4.

(PARAGRAPH 52)

CAPT. JEFFERSON FAILED TO TRAIN, CONTROL AND OR SUPERVISE CORRECTIONAL OFFICERS CITED IN THIS CLAIM IN REGARDS TO THEIR VIOLATING MY CONSTITUTIONAL RIGHTS IN ALL ASPECTS.

(PARAGRAPH 53)

F.C.M.'S DOCTOR, DR. BOSTON FAILED TO PROVIDE ADEQUATE MENTAL HEALTH TREATMENT AND OR THERAPY FOR ME ~~QUANTITATIVE~~ DURING MY INCARCERATION AT THE H.R.Y.C.I.

(PARAGRAPH 54)

C/O B. APA AND C/O C. JOHNSON UTILIZED UNJUSTIFIABLE FORCE AGAINST ME, WHILE I WAS HOUSED ON I-F POD BY TACKLING ME AND STRICKING ME WITH THE FIST AND FEET.

(PARAGRAPH 55)

(I.A) INTERNAL AFFAIRS FAILED TO SUPERVISE AND OR CONTROL (D.D.O.C) CORRECTIONAL OFFICERS AFTER BEING NOTIFIED THAT I WAS BEING VIOLATED BY ~~NUMEROUS~~ SEVERAL CORRECTIONAL OFFICERS ON MANY DIFFERENT OCCASSIONS, IN WHICH VIOLATES MY CONSTITUTION RIGHTS IN ALL ASPECTS.

(PARAGRAPH 56)

ON FEBRUARY 11, 2005 H.R.Y.C.I WARDEN RAPHEL WILLIAMS AND STAFF CAME TO I-E POD, ~~XXXXXXXXXXXX~~ SEEKING TO FIND KEYS THAT C/O WEAR LOST, AT THAT TIME A THOURGSH SEARCH OF EACH ROOM WAS CONDUCTED, IN WHICH MANY DOCUMENTS IN DIRECT RELATION TO THE COMPLAINTS THAT I KNOW CLAIM WERE REMOVED FROM MY ASSIGNED CELL FOR INVESTIGATION AS I WAS TOLD, BUT AS OF TO DATE NONE OF MY DOCUMENTS HAVE BEEN RETURNED TO ME, IN WHICH ARE VITAL FOR THE SEARCH OF THE TRUTH IN THIS CASE, IN WHICH ~~XXXX~~ HAS VIOLATED MY CONSTITUTIONAL RIGHTS.

(PARAGRAPH 57)

ON MARCH 28, 2005 CORPORAL CURRINGTON SERVED ME WITH A DISCIPLINARY REPORT DATED FEB, 17, 2005 THAT WAS APPROVED BY LT. S. PARMER. MY UNITED STATES CONSTITUTIONAL RIGHTS TO DUE PROCESS HAVE BEEN VIOLATED BECAUSE MY WITNESSES WERE TRANSFERRED TO ANOTHER FACILITY, AND I AM NOT ABLE TO PROPERLY DEFEND MYSELF